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September 15, 2022

Hon. Valeri E. Caproni
Judge, United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

USDC SDNY
DOCUMENT
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DATE FILED: 09/16/2022

MEMO ENDORSED

Re: *United States v. Glen Davis*, 21 Cr. 603 (VEC)

Dear Judge Caproni,

With the consent of the government and pre-trial services in the Central District of California and the Southern District of New York, Glen Davis writes this Court to request modification of one of his conditions of release so that he may travel *within* the United States, for work, without prior order of the Court.

Pretrial officers Tiffany Rivers and Karina Chin Vileor join in this request for two reasons: i) Mr. Davis has complied with the conditions set by the Court in its May 24, 2022 Bail Order (ECF # 285, attached as Ex. A); and ii) modification would assist them more easily supervise Mr. Davis.

Should the Court grant the modification, Mr. Davis would continue to abide by all other conditions of release and also abide by the specific conditions noted in the Court's May 24, 2022 Bail Order. Mr. Davis would notify Officer Rivers by email (with a copy to defense counsel), 7 days in advance of his anticipated domestic travel, and include in the email notification the following: i) date and place of start and return of travel; ii) where and with whom Mr. Davis would stay during the travel; and iii) proof that travel is work related.

We thank the Court for its time and consideration of this matter.

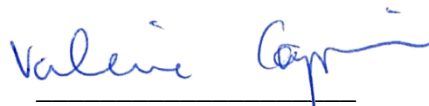
Respectfully submitted,

/s/Sabrina Shroff
Counsel to Glen Davis

cc: Pre-Trial Services

Application GRANTED. If Mr. Davis's work requires air travel, Mr. Davis must also inform Defense Counsel and Pretrial Services of the applicable flight information.

SO ORDERED:


Hon. Valerie E. Caproni

09/16/2022